

Orin Snyder (*pro hac vice pending*)
osnyder@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Joshua S. Lipshutz (SBN 242557)
jlipshutz@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

Brian M. Lutz (SBN 255976)
blutz@gibsondunn.com
Kristin A. Linsley (SBN 154148)
klinsley@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant Facebook, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DEBRA KOOSER and MARGARET
FRANKIEWICZ, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., CAMBRIDGE
ANALYTICA, SCL Group, Ltd, and Global
Science Research Ltd.

Defendants.

CASE NO. 3:18-CV-02009-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

**DEFENDANT FACEBOOK, INC.'S
REPLY IN SUPPORT OF MOTION TO
STAY**

Hearing Date: May 24, 2018
Time: 10:00 a.m.
Location: Courtroom 4, 17th Floor, 450 Golden
Gate Avenue, San Francisco, California,

(additional captions below)

1 LAUREN PRICE, on behalf of herself and
all others similarly situated,

2 Plaintiffs,

3 v.

4 FACEBOOK, INC. and CAMBRIDGE
5 ANALYTICA,

6 Defendants.

CASE NO. 3:18-CV-01732-VC
SAN FRANCISCO DIVISION

7
8 JONATHAN D. RUBIN on behalf of himself and
all others similarly situated,

9 Plaintiff,

10 v.

11 FACEBOOK, INC., SCL GROUP, GLOBAL
12 SCIENCE RESEARCH LTD., and
13 CAMBRIDGE ANALYTICA LLC

14 Defendants.

CASE NO. 3:18-CV-01852-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

15
16 ASHLEY GENNOCK and RANDY NUNEZ, on
behalf of themselves and all others similarly
17 situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC. and CAMBRIDGE
21 ANALYTICA

22 Defendants.

CASE NO. 3:18-CV-01891-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

HOWARD O'KELLY, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC. and CAMBRIDGE
ANALYTICA

Defendants.

CASE NO. 3:18-CV-01915-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

THERESA BEINER and BRANDON
HAUBERT, et al., on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC. and CAMBRIDGE
ANALYTICA, LLC

Defendants.

CASE NO. 3:18-CV-01953-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

SUZIE HASLINGER, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC. and CAMBRIDGE
ANALYTICA LLC

Defendants.

CASE NO. 3:18-CV-01984-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

1 TAYLOR PICHA, on behalf of herself and all
2 others similarly situated,

3 Plaintiff,

4 v.

5 FACEBOOK, INC. and CAMBRIDGE
6 ANALYTICA

7 Defendants.

CASE NO. 3:18-CV-02090-VC
SAN FRANCISCO DIVISION

8 CHRISTINA LABAJO, on behalf of herself and
9 all others similarly situated,

10 Plaintiff,

11 v.

12 FACEBOOK, INC. and CAMBRIDGE
13 ANALYTICA

14 Defendants.

CASE NO. 3:18-CV-02093-VC
SAN FRANCISCO DIVISION

15
16 JOSHUA IRON WING and RYAN MCGRATH,
17 on behalf of themselves and all others similarly
situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.

21 Defendant.

CASE NO. 3:18-CV-02122-VC
SAN FRANCISCO DIVISION

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CONSENT MOTION

SANFORD BUCKLES, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC.

Defendant.

CASE NO. 3:18-CV-02189-VC
SAN FRANCISCO DIVISION

LUCY GERENA, on behalf of herself and all
others similarly situated,

Plaintiff

v.

FACEBOOK, INC.

Defendant

CASE NO. 3:18-CV-02201-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

PATRICIA KING, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

FACEBOOK, INC. and CAMBRIDGE
ANALYTICA LLC

Defendants.

CASE NO. 3:18-CV-02276-VC
SAN FRANCISCO DIVISION

CONSENT MOTION

1 Facebook, Inc. (“Facebook”) respectfully submits this reply in support of its April 18, 2018
2 Motion to Stay, currently noticed for argument on May 24, 2018.

3 Plaintiffs’ oppositions to Facebook’s motion to stay all proceedings pending a ruling from the
4 JPML in MDL No. 2843 were due on May 2, 2018. As of today, no plaintiff has lodged an opposi-
5 tion. Prior to filing, plaintiffs in *Rubin*, *Gennock*, *O’Kelly*, *Beiner*, *Haslinger*, *Kooser*, *Iron Wing*,
6 *Gerena* and *King* consented to this relief. *O’Kelly* filed a response indicating no objection “provided
7 it is entered without prejudice to Plaintiffs’ ability to seek interim relief from the Court if necessary,”
8 which the proposed order already provides. *O’Kelly*, Dkt. 16. *Gerena* also filed a document indicat-
9 ing plaintiffs’ “nonopposition” to the stay. *Gerena*, Dkt. 18. *Rubin* also filed a pleading indicating
10 that he “agrees to Facebook’s Motion to Stay.” *Rubin*, Dkt. 32. Other plaintiffs have not filed any
11 response.

12 As plaintiffs have not opposed Facebook’s requested relief, Facebook respectfully requests
13 that the Court enter Facebook’s proposed order and, pursuant to Local Rule 7-1(b), that the Court do
14 so without holding argument.

1 DATE: May 9, 2018

Respectfully submitted,

2 **GIBSON, DUNN & CRUTCHER, LLP**

3 By: /s/ Joshua S. Lipshutz
4 Joshua S. Lipshutz (SBN 242557)
5 jlipshutz@gibsondunn.com
6 GIBSON, DUNN & CRUTCHER LLP
7 1050 Connecticut Avenue, N.W.
8 Washington, DC 20036-5306
9 Telephone: 202.955.8500
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21 blutz@gibsondunn.com
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26 Facsimile: 415.393.8306

27 *Attorneys for Defendant Facebook, Inc.*